



George Latimer
County Executive

Department of Law

John M. Nonna
County Attorney

February 1, 2023

VIA CM/ECF

Hon. Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: Joint Letter Motion for Extension of Time to Respond to Complaint
Lane v. James et. al., No. 22-cv-10989 (KMK) (S.D.N.Y.)


Your Honor,

In compliance with Rule 1(C) of Your Honor's Individual Rules of Practice dated February 5, 2020, defendant Miriam E. Rocah, in her official capacity as District Attorney for the County of Westchester, New York (hereinafter "DA Rocah"), together with our co-defendants Letitia James, in her official capacity as Attorney General of the State of New York and Steven Nigrelli, in his official capacity as Superintendent of the New York State Police (hereinafter "the State Defendants"), hereby request an extension of time to respond to the Complaint filed in the above-referenced action to **March 3, 2023**.

This is the Defendants' first request for an extension. DA Rocah's response is currently due February 3, 2023 and the State Defendants' response is currently due February 8, 2023. Plaintiffs' counsel has consented to our request for an adjournment.

Respectfully submitted,

JOHN M. NONNA
Westchester County Attorney
Attorney for County Defendants

By: 
Phoenix Marino
Assistant County Attorney, of Counsel
Michaelian Office Building
148 Martine Avenue, Room 600
White Plains, NY 10601
(914) 995-5103
pqmr@westchestergov.com



PM/

CC: Nicolas J. Rotsko, Esq. (*via CM/ECF*)
PHILLIPS LYTLE, LLP
Counsel for Plaintiffs
One Canalside
125 Main Street
Buffalo, New York 14203-2887
nrotsko@phillipslytle.com

Yuval Rubinstein, Esq. (*via email*)
Counsel for State Defendants
28 Liberty Street
New York, New York 10005
yuval.rubinstein@ag.ny.gov